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February 28, 2023

**Via ECF and E-Mail**

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Barend Oberholzer, 1:21-cr-00475-ALC***

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request that the Court modify Mr. Oberholzer's bail conditions to allow him to travel to Atlanta, Georgia and Washington, D.C. for a five-day business trip. He would leave March 5, 2023 to travel to Atlanta, Georgia for the annual Helicopter Association International (HAI) Helicopter Conference, before traveling to Washington, D.C. on March 8 for a business meeting and returning home on March 10.

Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. I emailed AUSA Kamal on February 22, 2023 and again on February 27, 2023. As of the date of this filing, I have not received a response from opposing counsel. By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, inter alia, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release.

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We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Ryan P. Poscablo

Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)  
Dominique Jackson, Pretrial Services (by email)

So Ordered:

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Hon. Andrew L. Carter, Jr.